## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

UNITED	STATES	OF A	MERICA
--------	--------	------	--------

v.

Criminal No. 4:16-CR-205-O

ANTHONY CLARK (01)

## **GOVERNMENT'S WITNESS LIST**

No.	PROBABLE WITNESSES	SWORN	TESTIFIED
1.	Ahsan Nanji Electronic Arts, Inc. Director of Project Management		
	This witness will testify as an "expert" witness concerning the FIFA video game. Mr. Nanji will discuss how the FIFA game functions and his role in Electronic Arts' investigation into the fraud being perpetrated on Electronic Arts' servers to illegally obtain FIFA coins.		
2.	Kirsten Daru Electronic Arts, Inc. Associate General Counsel, Chief Privacy Officer  This witness will testify concerning Electronic Arts' Terms of Service.		
3.	Ronnie Buentello (CO-CASE AGENT) Special Agent Federal Bureau of Investigation  This witness will testify as the co-lead case agent for the government. Agent Buentello will discuss his role in the investigation and how his investigation reached beyond the Northern District of Texas. Agent Buentello will also provide "expert" testimony concerning how he performed forensic images of all of the defendant's electronic devices and reviewed some of these images pursuant to a search warrant.		

No.	PROBABLE WITNESSES	SWORN	TESTIFIED
4.	Nicholas Castellucci		
	Co-defendant Co-defendant		
	This witness is a co-defendant in this case and will testify regarding his knowledge and participation in the alleged conspiracy.		
5.	Ricky Miller		
	Co-defendant Co-defendant		
	This witness is a co-defendant in this case and will testify regarding his knowledge and participation in the alleged conspiracy.		
6.	Eaton Zveare		
	Co-defendant		
	This witness is a co-defendant in this case and will testify regarding his knowledge and participation in the alleged conspiracy.		
7.	Robert Starr		
	Task Force Officer		
	Internal Revenue Service – Criminal Investigations		
	This witness will testify as one of the investigators that assisted in investigating this case. TFO Starr will discuss his role in the investigation, which included the financial analysis relied upon to justify the seizure of various assets contained in the forfeiture notice of the indictment.		

No.	POSSIBLE WITNESSES	SWORN	TESTIFIED
8.	Huey Nguyen		
	Criminal Investigator/Digital Forensics Examiner		
	Tarrant County Criminal District Attorney's Office		
	This witness may testify that when he was a Task Force Officer with the FBI, he assisted in reviewing the electronic devices seized from the defendant pursuant to a search warrant.		

9. Alan Hampton (CO-CASE AGENT)
Special Agent
Internal Revenue Service – Criminal Investigations

This witness may testify as one of the investigators that assisted in investigating this case. Agent Hampton will discuss his role in the investigation, which included the financial analysis relied upon to justify the seizure of various assets contained in the forfeiture notice of the indictment.

Respectfully submitted,

JOHN R. PARKER UNITED STATES ATTORNEY

/s/ Brian D. Poe BRIAN D. POE Assistant United States Attorney Northern District of Texas Texas State Bar No. 24056908 801 Cherry Street, Suite 1700 Fort Worth, Texas 76102 Telephone: 817.252.5447

Facsimile: 817.252.5455

E-mail: <u>brian.poe@usdoj.gov</u>

## **CERTIFICATE OF SERVICE**

I certify that on November 7, 2016, I electronically filed this document with the Clerk for the United States District Court, Northern District of Texas, using the electronic case filing ("ECF") system. The ECF system will send a "Notice of Electronic Filing" to all parties/counsel for record who have consented in writing to accept the Notice as service of this document by electronic means.

/s/ Brian D. Poe BRIAN D. POE Assistant United States Attorney